

1 Amy M. Samberg (NV Bar No. 10212)
2 amy.samberg@clydeco.us
3 Dylan P. Todd (NV Bar No. 10456)
4 dylan.todd@cyldeco.us
5 CLYDE & CO US LLP
6 7251 W. Lake Mead Blvd., Suite 430
7 Las Vegas NV 89128
8 Telephone: 725-248-2900
9 Facsimile: 725-248-2907

10 *Attorneys for Plaintiff*
11 *Safeco Insurance Company Of America*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SAFECO INSURANCE COMPANY OF
15 AMERICA,

16 Plaintiff,

17 v.

18 JOHN JOSEPH-LOUIS JOHNSON, II, an
19 individual, and HONOUR LIGHT
20 INTERNATIONAL, INC.

21 Defendants.

22 CASE NO.: 2:23-cv-00743-JCM-NJK

23 **STIPULATION FOR EXTENSION OF
24 TIME TO RESPOND TO HONOUR
25 LIGHT INTERNATIONAL, INC.'S
26 COUNTERCLAIM**

27 **(First Request)**

28 Plaintiff Safeco Insurance Company Of America (“Safeco”) and Defendant Honour Light International, Inc. (“HLI”) (collectively the “Parties”) hereby submit this Stipulation to Extend the Time to Respond to HLI’s Counterclaim. The parties have stipulated to extend the response deadline to **September 8, 2023**.

29 ////

30 ////

31 ////

32 ////

33 ////

34 ////

35 ////

1 The original deadline for Safeco to respond to the Counterclaim was August 25, 2023.
2 Good cause exists to grant this extension. Specifically, the parties were advised that settlement
3 discussions are taking place in the underlying litigation that, if successful, would cause that this
4 action can be completely dismissed. As such, the parties are seeking a two (2) week extension to
5 allow the settlement discussions to play out and to conserve costs in the event that this matter can
6 be resolved.

8 | Dated: August 24, 2023

9 JESSE SBAIH & ASSOCIATES, LTD. CLYDE & CO US LLP

11 /s/ Jesse M. Sbaih By
12 Jesse M. Sbaih (#7898)
13 Ines Olevic-Saleh (#11431)
14 The District at Green Valley Ranch
15 170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 896-2529
Fax (702) 896-0529
Email: jsbaih@sbaihlaw.com
iolevic@sbaihlaw.com

/s/ Dylan Todd
Amy M. Samberg (NV Bar No. 10212)
amy.samberg@clydeco.us
Dylan P. Todd (NV Bar No. 10456)
dylan.todd@cyldeco.us
7251 W. Lake Mead Blvd., Suite 430
Las Vegas NV 89128
Telephone: 725-248-2900
Facsimile: 725-248-2907

*Attorneys for Plaintiff
Safeco Insurance Company Of America*

ORDER

22 The above Stipulation IS SO ORDERED.

23 | Dated: August 25, 2023


Nancy J. Koppe
United States Magistrate Judge